UNITED STATES DISTRICT COURT EASTERN DISTRICT OF PENNSYLVANIA

MAXINE L. BEACH, on behalf of herself:

and all others similarly situated,

:

Plaintiff,

C A No 15 5042

v.

C.A. No. 15-5942-TJS

AMERICAN HERITAGE FEDERAL

CLASS ACTION

CREDIT UNION,

:

Defendant.

:

PLAINTIFF'S MOTION FOR ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES

Plaintiff Maxine L. Beach hereby moves this Court for an award of attorneys' fees and costs, as prevailing party in this class action settlement. The reasons supporting this Motion are set forth in the accompanying Memorandum of Law and Declaration of David A. Searles submitted in support of Plaintiff's motion.

Respectfully submitted,

FRANCIS & MAILMAN, P.C.

Dated: June 15, 2017 BY: /s/ David A. Searles

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Attorneys for Plaintiff and Class

CERTIFICATE OF SERVICE

I do hereby certify that, on this date, I caused a true and correct copy of the foregoing to be served via the Court's CM/ECF Notification system upon all counsel of record.

/s/ David A. Searles
DAVID A. SEARLES

Dated: June 15, 2017